

EXHIBIT 4

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

Page 1

1 COURT OF COMMON PLEAS

2 MADISON COUNTY, OHIO

3 * * *

4
5 STATE OF OHIO, ex rel.

Dave Yost, in his capacity

6 as Attorney General of Ohio,

7 Plaintiff,

8
9 vs.

CASE NO. CVH20180055

10 McKESSON CORPORATION, et al.,

11 Defendants.

12 * * *

13
14 VOLUME I

15 Videotaped Deposition of

16 JOSEPH RANNAZZISI, a witness herein, called by

17 the defendants for examination pursuant to the

18 Rules of Civil Procedure, taken before me,

19 Patti Stachler, RMR, CRR, a Notary Public

20 within and for the State of Ohio, in Annandale,

21 Virginia, on July 16, 2020, at 9:21 a.m.

22 * * *

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1 testify in the MDL trial, yes.

2 Q. And were you going to get paid for
3 that?

4 A. No. I've only gotten -- no.
5 There was no payment. The only time I ever got
6 paid for anything in the MDL was when they
7 asked me to appear in front of Judge Polster to
8 talk about ARCOS and quota. Other than that,
9 I've never gotten paid. In fact, when I went
10 through deposition those two days, that was all
11 as a fact witness.

12 Q. And how much did you get paid to
13 come talk to Judge Polster by plaintiff
14 lawyers?

15 A. I believe, with hotel and travel,
16 right around \$7,000.

17 Q. \$7,000. Do you know who paid you
18 in that case?

19 A. That was paid by Motley Rice.

20 Q. How many different plaintiff law
21 firms have paid you, do you know?

22 A. Besides Motley Rice?

23 Q. And Fields?

24 A. And Fields.

25 Q. And the current plaintiff's law

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1 firm?

2 A. Two others.

3 Q. So a total of three?

4 A. Motley Rice, Fields, KMK, and
5 Boies Schiller.

6 Q. So four different plaintiff law
7 firms have paid you?

8 A. Yes.

9 Q. How much has Motley Rice paid you
10 in total?

11 MR. UTTER: Mr. Schmidt, I want to
12 interrupt here for a moment. Yesterday counsel
13 for ABD said it was the defendants' position that
14 the experts were not going to be asked to disclose
15 payment from other law firms. Today I now hear
16 you're asking questions about payments from other
17 law firms.

18 Is it defendants' position that
19 it's discoverable from all the experts all the
20 monies have been paid related to opioids from
21 all law firms? Is that your position?

22 MR. SCHMIDT: I think what our
23 position is -- and thank you for asking that and
24 for clarifying that -- is I suppose if we could
25 reach agreement that no experts will be asked

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1 100,000 --

2 A. Not by Fields.

3 Q. -- by -- by the Fields law firm?

4 A. No. I think I testified that I
5 was paid under -- under a certain amount of
6 money, but it wasn't for the Fields law firm.
7 It was for opioid litigation in general.

8 Q. Is it true, sir, that you have
9 been paid more than 100,000 by the Fields law
10 firm; yes or no?

11 A. No, that's not true.

12 Q. Okay. Okay. Do you recall giving
13 testimony in the MDL?

14 A. Yes.

15 Q. Do you recall testifying in the
16 MDL that you had been paid more than 100,000 by
17 the Fields law firm?

18 A. I believe the testimony was I was
19 paid more than 100,000 by attorneys that worked
20 with -- that were -- we contracted with through
21 the Fields law firm. Those payments were not
22 from the Fields law firm. Those payments were
23 from the other law firms, Boies Schiller -- you
24 know, there was another law firm. I just
25 remembered. Gilbert, LLP.